



Received & Inspected

JUL 27 2011

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Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

Date: July 22, 2011

Letter of appeal to respectfully request the Commission a review of our situation and a waiver of the charges listed on the USAC statement of account dated 06/22/2011.

Primo Communications Inc is a very small long distance reseller with five employees. We resold services mostly from Global Crossing Bandwidth and in June 2009 started to resell from Primus Telecommunications Inc.

Starting July 18 2007 Global Crossing started to collect from us the USF charges on your behalf and they said that we were listed on the USAC website as non contributors and do not need to file the returns. As shown on the attached invoices we paid through Global Crossing from July 18, 2007 through April 18, 2010 the amount of \$100,576.91 in USF charges.

Primus Telecommunications Inc, charged us from June 29, 2009 through November 17, 2010 as shown on the attached invoices, the amount of \$76,129.89 in USF charges.

We paid a total of \$ 176, 706.80 in USF charges from 2007 through 2010.

Then in 2010 we received several enquiries from the FCC/USAC regarding our missing returns. We talked to the USAC staff and tried to explain the situations and expressed our good faith effort to get it resolved. The USAC staff advised us to file all the missing returns and then they will work with us in resolving the situation..

We filed the returns along with the attached letter explaining the situation and requesting that someone contact us and work with us.

Instead we got hit with a bill of \$280,361.76 even though we already paid indirectly over \$176,000 in USF charges. Most of USAC bill is late fees, penalties and interest as the USAC rep told us that less than \$30,000 represents the charges we would have to pay.

We are a very small company, providing very competitive services, and a bill for \$280,361.76 would put an unsustainable financial burden on our company leading to our closing and elimination of our jobs.

We respectfully request the commission to take in consideration that over the period 2007 through 2010 we did contribute indirectly to the USFE \$176,706.80.

We respectfully request the Commission to wave the charges, penalties and interest in the statement of account we received from USAC as we indirectly paid the USFE contributions of \$30,000 we owed as well and more that \$140,000 in excess of what the USAC would have originally imposed.

We also respectfully request the Commission to order Global Crossing and Primus Telecommunications to pay \$30,000 to USAC and return to us the amount of \$146,000 they collected from our company in excess of the amount we actually owed to the USAC.

If there are any questions, please contact me at the above numbers, or my mobile: (248)396-7849. My email address is ben.a@primold.com.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Benjamin Ardelean". The signature is fluid and cursive, with a long horizontal stroke at the end.

Benjamin Ardelean/CEO